

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**EDWARD J. GLEASON, (01)**  
**a/k/a/ "CHAMP",**  
**a/k/a "MEXICO",**  
[DOB: 07/20/1975]

**MICHAEL C. WINN, (02)**  
[DOB: 08/05/1956]

**ANTONY P. ZICARELLI, (03)**  
**a/k/a "ZIGGY"**  
[DOB: 04/20/1960]

**and**

**TERRANCE A. HACKETT, (04)**  
**a/k/a/ "DREADS",**  
[DOB: 06/17/1988]

Defendants.

**Defendant Charged Counts Summary:**

**GLEASON (01):** Counts 1 through 10

**WINN (02):** Count 1

**ZICARELLI (03):** Counts 1, 11, 12, 13, 14 and 15

**HACKETT (04):** Counts 1 and 15

Case No. \_\_\_\_\_

**COUNT ONE:**

***(Conspiracy to Distribute 500 Grams or More of Methamphetamine)***

21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846

NLT: 10 Years Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years Supervised Release

Class A Felony

**COUNTS TWO, THREE, and FIVE through FOURTEEN:**

***(Distribution of Methamphetamine)***

21 U.S.C. §§ 841(a)(1) and (b)(1)(C) (all counts); and 18 U.S.C. § 2 (Count Six only)

NMT: 20 Years Imprisonment

NMT: \$1,000,000 Fine

NLT: 3 Years Supervised Release

Class C Felony

**COUNTS FOUR and FIFTEEN:**

***(Possession With Intent to Distribute 50 Grams or More of Methamphetamine)***

21 U.S.C. §§ 841(a)(1) and (b)(1)(B) (both counts); and 18 U.S.C. § 2 (Count Fifteen only)

NLT: 5 Years Imprisonment

NMT: 40 Years Imprisonment

NMT: \$5,000,000 Fine

NLT: 4 Years Supervised Release

Class B Felony

**FORFEITURE ALLEGATION:**

All Defendants

21 U.S.C. § 853

## **INDICTMENT**

### **THE GRAND JURY CHARGES THAT:**

#### **COUNT ONE**

From on or about October 1, 2014, continuing until the date of this indictment, in the Western District of Missouri and elsewhere, the defendants, **EDWARD J. GLEASON, a/k/a “CHAMP”, a/k/a “MEXICO”, MICHAEL C. WINN, ANTONY P. ZICARELLI, a/k/a “ZIGGY”, and TERRANCE A. HACKET, a/k/a “DREADS”** did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to distribute five-hundred (500) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all contrary to the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

#### **COUNT TWO**

On or about February 16, 2015, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT THREE**

On or about March 2, 2015, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT FOUR**

On or about March 12, 2015, in the Western District of Missouri, the defendants, **EDWARD J. GLEASON**, did knowingly and intentionally possess with the intent to distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

#### **COUNT FIVE**

On or about August 4, 2015, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT SIX**

On or about August 26, 2015, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, aiding and abetting another, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

#### **COUNT SEVEN**

On or about September 24, 2015, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT EIGHT**

On or about December 3, 2015, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT NINE**

On or about December 15, 2015, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT TEN**

On or about January 21, 2016, in the Western District of Missouri, the defendant, **EDWARD J. GLEASON**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT ELEVEN**

On or about March 2, 2016, in the Western District of Missouri, the defendant, **ANTONY P. ZICARELLI, a/k/a "ZIGGY"**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### **COUNT TWELVE**

On or about March 9, 2016, in the Western District of Missouri, the defendant, **ANTONY P. ZICARELLI, a/k/a "ZIGGY"**, did knowingly and intentionally distribute a

mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT THIRTEEN**

On or about April 20, 2016, in the Western District of Missouri, the defendant, **ANTONY P. ZICARELLI, a/k/a “ZIGGY”**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT FOURTEEN**

On or about May 5, 2016, in the Western District of Missouri, the defendant, **ANTONY P. ZICARELLI, a/k/a “ZIGGY”**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### **COUNT FIFTEEN**

On or about May 11, 2016, in the Western District of Missouri, the defendants, **ANTONY P. ZICARELLI, a/k/a “ZIGGY”**, and **TERRANCE A. HACKETT, a/k/a “DREADS”**, aiding and abetting each other, did knowingly and intentionally possess with the intent to distribute fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and Title 18, United States Code, Section 2.

## **FORFEITURE ALLEGATION**

1. The allegations contained in Counts One through Fifteen of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of one or more of the controlled substance offenses alleged in Counts One through Fifteen of this Indictment, the defendants, **EDWARD J. GLEASON, a/k/a “CHAMP”, a/k/a “MEXICO”, MICHAEL C. WINN, ANTONY P. ZICARELLI, a/k/a “ZIGGY”, and TERRANCE A. HACKET, a/k/a “DREADS”**, shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Counts One through Fifteen of this Indictment, including, but not limited to the following:

- a. All currency which was received during, involved in or used or intended to be used to facilitate the crimes alleged in Counts One through Fifteen of this Indictment, which amount is at least \$3,494,400 in proceeds, as a money judgment, in that the property was involved in the offenses or is traceable to such property, in violation of Title 21, United States Code, Section 841(a)(1).

## **SUBSTITUTE ASSETS**

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

4/19/17  
DATE

/s/ Megan M. DeLeo  
FOREPERSON OF THE GRAND JURY

/s/ Alison D. Dunning  
Alison D. Dunning, #47938  
Assistant United States Attorney  
Narcotics & Violent Crimes Unit  
Western District of Missouri